



**DEPARTMENT OF THE ARMY**  
**HEADQUARTERS, UNITED STATES ARMY DENTAL COMMAND**  
**2050 WORTH ROAD**  
**FORT SAM HOUSTON, TEXAS 78234-6000**

REPLY TO  
ATTENTION OF

MCDS

17 June 2003

MEMORANDUM FOR All U.S. Army Dental Command Personnel

SUBJECT: U.S. Army Dental Command (DENCOM) Policy Letter 03-20,  
Expanded Scope of Practice for Dental Hygienists and Dental  
Assistants

1. REFERENCES:

a. AR 40-1, Composition, Mission, and Functions of the Army  
Medical Department.

b. AR 40-2, Army Medical Treatment Facilities General  
Administration.

c. AR 40-48, Nonphysician Health Care Providers

d. AR 40-68, Quality Assurance Administration

2. SCOPE: This policy applies to all DENCOM facilities and to  
all personnel assigned to or working in those facilities.

3. BACKGROUND: The freedom of the Federal Government from state  
regulation is governed by long-established principles of  
Federalism. The Federal Government is essentially immune from  
state regulatory interference. Concomitantly, Federal employees  
acting within the scope of their duties are also free from state  
regulatory requirements. Whether or not dental providers possess  
formal privileges is irrelevant to the issue of their lawful  
authority to perform their duties in a Federal facility.  
Instead, the underlying authority to act, for both privileged and  
non-privileged providers, is command authorization in accordance  
with military regulation. These concepts are important with  
regard to utilization of health care providers whose training,  
clinical abilities, and/or licensure credentials exceed those  
recognized by the state in which the provider practices. Such  
situations may occur with regard to dental hygienists that hold a  
state license that allows them to administer local anesthetic  
under the supervision of a licensed dentist. It also applies to  
utilization of non-licensed personnel such as properly trained  
expanded duty dental assistants

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#### 4. POLICY:

a. The DENTAC Commander is responsible for the credentialing of dental providers, the granting of their clinical privileges, and all other aspects of their professional qualifications, including their utilization and management.

b. Formal clinical privileges are not normally required for dental hygienists or dental assistants, since neither provider has the authority to make independent decisions on course of treatment issues. Nonetheless, when the scope of practice for dental hygienists or dental assistants is expanded beyond the procedures listed in AR 40-68, the following criteria must be satisfied:

(1) The provider will submit a written request to the commander for the additional procedures.

(2) The provider must provide evidence of completion of an approved course of competency training for the additional procedures.

(3) If the credentials committee or DENTAC commander has reason to question the training, qualifications, or competency of any individual requesting an expanded scope of practice, the individual may be required to demonstrate clinical proficiency. In such situations, an appropriately experienced dental officer must sign a statement certifying that the individual has demonstrated clinical proficiency (sample statement is attached).

(4) The credentials committee will review each request to extend the scope of practice and verify all documentation. Results of the credentials committee review will be entered in the committee minutes.

(5) Commanders will appoint a supervising and alternate supervising dentist for dental hygienists that are authorized to administer local anesthesia. Each provider involved in this process will receive written notification that describes the supervisory plan.

c. A credentials file will be established and maintained for all ancillary personnel who are granted an expanded scope of practice. This file will contain, at a minimum:

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- (1) All documents as required by AR 40-68.
- (2) Current license, if applicable.
- (3) The commander's written approval of the expanded  
scope of practice.
- (4) Supervisory plan.

d. In all cases, but within the above parameters, the level  
and scope of additional privileges authorized by the commander  
will be determined on an individual basis with regard to the  
individual's training, degree of experience, and demonstrated  
competence.

e. The point of contact is COL John Storz at DSN 471-6528.

SIDNEY A. BROOKS  
Colonel, Dental Corps  
Commanding

## STATEMENT OF PROFICIENCY

Office Symbol

Date

SUBJECT: Demonstration of Clinical Proficiency.

Name and grade of individual has demonstrated clinical proficiency and knowledge of the procedures identified below by treating patients while under the direct supervision of a privileged and experienced dental officer.

List of Procedures (Use ADA CDT-2 nomenclature when appropriate):

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Officer Certifying Clinical Proficiency:

Name and Grade:

Title:

Signature:

DENTAC Commander's Signature Block